

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MMA Consultants 1, Inc.,

Plaintiff,

v.

The Republic of Peru,

Defendant.

No. 15-cv-5551

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of its Motion to Dismiss the Complaint and the accompanying Declarations of Vanessa Soderberg and James H. Lide dated April 4, 2016, and all of the pleadings and proceedings had herein, Defendant Republic of Peru hereby moves the Honorable Deborah A. Batts of the United States District Court of the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an order, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing with prejudice the Complaint in the above-captioned action and granting such further and other relief as this Court deems just and proper.

DATED: April 4, 2016

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